

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jonathan Long

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2018 OCT -3 PM 3:41

(In the space above enter the full name(s) of the plaintiff(s).)

18CV9068
COMPLAINT

-against-

The City of Mount Vernon; Mount Vernon

under the
Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint)

Police Detective Antonini; Mount Vernon

Police Detective ~~John Doe A.K.A.~~ "Puff"

Individually and Officially being sued.

Jury Trial: ☒ Yes ☐ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Jonathan Long
 ID # 7483
 Current Institution 57 Terrance Terrace Apt 23 West Co Jail
 Address Mount Vernon, New York 10553 P.O. Box 10
(914) 325-8278 St. Vulwalla, NY 10595

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name City of Mount Vernon Shield # _____
 Where Currently Employed City of Mount Vernon
 Address Dept. of Law City Hall Room 111
1 Roosevelt Sq.
Mount Vernon, New York 10550

Defendant No. 2 Name Police Officer Antonini Shield # 111
 Where Currently Employed Mount Vernon Police Dept.
 Address Dept. of Law City Hall Room 111
1 Roosevelt Sq.
Mount Vernon, New York 10550

Defendant No. 3 Name Police Officer ~~John Doe~~ PUFF Shield # 210
 Where Currently Employed Mount Vernon Police Dept.
 Address Dept. of Law City Hall Room 111
1 Roosevelt Sq.
Mount Vernon, New York 10550

Defendant No. 4 Name _____ Shield # _____
 Where Currently Employed _____
 Address _____

Defendant No. 5 Name _____ Shield # _____
 Where Currently Employed _____
 Address _____

II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

- A. In what institution did the events giving rise to your claim(s) occur?

- B. Where in the institution did the events giving rise to your claim(s) occur?

- C. What date and approximate time did the events giving rise to your claim(s) occur?
June 8, 2018, City of Mount vernon

D. **Facts:** On the date of June 8th, 2018 while at a friends house in the City of Mount Vernon located at [redacted]

What happened to you?

Defendants 1-2 and several other under cover and uniform members of the Mount vernon police Department conducted a police raid within my friends house, because Mount Vernon

Who did what?

Police Officer Valente 2059 alleged that he observed me two sales of crack cocaine. Note: at the inception of the aforesaid police raid the officers did not have a search

Was anyone else involved?

warrant. both defendants and several other uniform and police officers began to conduct a massive search of the resid-

ents and the occupants thereof. However, approximately 15 minutes into the search one of the officers stated "every-

one out" Note: one of the Police officers was taking pictures, and a police dog was present. The house occupants

Who else saw what happened?

were subsequently brought into the hallway of the building awaiting officers to apply for a search warrant application

for premissis that they already searched. This can be proven by comparing the photographs associated with this case with the time and date, that the search warrant was applied for.

Sometime thereafter, all of the house occupants and defendants 1-2 escorted Plaintiff into the restroom in search of

III. Injuries

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Bruising, Rectum bleeding, cuts on Plaintiffs arms and legs from the assault, scratches to the neck, interfering with breathing, sexual assault, excessive force, illegal search of Plaintiff's rectum, and mouth.

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ___ No XX

narcotics. Plaintiff was ordered to strip naked, which he complied. He was then ordered to bend at the waist and spread his buttocks, when defendant 1 stated to defendant 2 " he stuffed in his ass!" defendants 1-2 then grabbed Plaintiff and defendant 2 shoved his fingers into Plaintiff's rectum causing him substantial and excruciating pain. Plaintiff began to scream out of fear, but defendant 1 began punch Plaintiff through out his body causing substantial pain and bruising through out his back, stomach, and ribs.

Defendant 2 was simultanenously shoving his fingers into Plaintiffs rectum attempting to fish for the alleged contraband.

Defendant 1 then began to choke Plaintiff screaming " spit it out" but Plaintiff did not have any contraband. Plaintiff nearly loss conciousness during this ordeal.

After approximately 3 minutes Plaintiff was allowed to get dressed, and charged for the alleged two observation sales.

Plaintiff avers, that the City of Mount Vernon has grossly failed to properly ~~train~~^{train} its officers as to the application of force, and they further fail to properly ~~train~~^{train} and supervise its officers. The City of Mount verson could not pretend to have not been aware of these police officers propensity to violate its residents civil rights as was done to Plaintiff due to the large Number of civil complaints and lawsuits for similar conduct filed in the U.S. Dist. for the Southern District of New York.

As a result Plaintiff was damaged.

Plaintiff avers, that defendants further conducted and additional strip frisk at the Mount Vernon Police Station, and refused him medical attention for his injuries inter alia.

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes _____ No _____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

On
other
claims

- C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?
Yes _____ No XX

- D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes _____ No _____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes ____ No ____ Do Not Know ____

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes ____ No ____ Do Not Know ____

If YES, which claim(s)? _____

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes ____ No ____

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes ____ No ____

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

1. Which claim(s) in this complaint did you grieve? _____

2. What was the result, if any? _____

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. _____

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: _____

2. If you did not file a grievance, but informed any officials of your claim, state who you informed, _____

when and how, and their response, if any: _____

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. _____

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). _____


_____ Compensatory damages against all defendants
_____ jointly and severally in the amount of \$2,000,000.00;
_____ Punitive damages against all defendants in the amount of
_____ \$10,000,000 jointly and severally;
_____ and Nominal damages.

VI. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes _____ No XX

On
these
claims

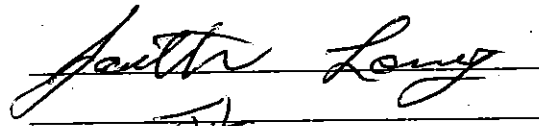
 I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30 day of Sept., 2018.


Signature of Plaintiff

Inmate Number

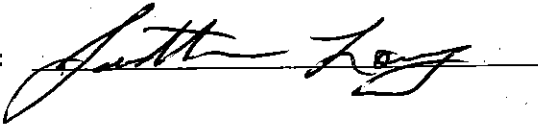
Institution Address


52
~~57 LORRAINE TERRANCE APT 231~~
~~56 MOUNT VERMONT, N.Y. 10533~~
~~WESTKESSEL COUNTY Jail~~
~~P.O. Box 10~~
~~VALHALLA, N.Y. 10595~~

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

 I declare under penalty of perjury that on this 30 day of Sept., 2018, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:





Jonathan Long
JID 7483
PO Box 10
Valhalla, N.Y. 10595

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TO: United States District
Southern District of New York
ATTN: PRO SE Clerk
500 Pearl St.
New York, N.Y. 10027

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(Legal mail)

